

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION**

In re:

**TALLAPOOSA RENEWABLE GREEN
ENERGY, INC.,**

Debtor.

CHAPTER 11

CASE NO. 19-12150-WHD

**TRUSTEE'S APPLICATION TO EMPLOY
JONES & WALDEN, LLC AS COUNSEL FOR TRUSTEE**

COMES NOW Leslie M. Pineyro, the Trustee, (hereinafter "Applicant") and respectfully applies for approval to employ attorneys pursuant to 11 U.S.C. §§ 105(a), 327 and 330 and Bankruptcy Rules 2014 and 5002. The grounds for this Application are:

1.

On October 30, 2019, Tallapoosa Renewable Green Energy, Inc. ("Debtor") filed a petition for relief under Chapter 11 of Title 11, United States Code, 11 U.S.C. §§ 101 et seq. (as amended, modified or supplemented, the "Bankruptcy Code").

2.

On January 6, 2020 ("Appointment Date"), the United States Trustee filed its "Application for Approval of Appointment of Chapter 11 Trustee" (Doc. No. 41), and Trustee accepted the appointment and filed the "Acceptance of Appointment as Chapter 11 Trustee" (Doc. No. 42). On January 7, 2020, the Court entered an Order approving such appointment (Doc. No. 43).

3.

Applicant wishes to employ the law firm of Jones & Walden, LLC ("J&W") as counsel in this Chapter 11 case.

4.

Attorneys of J&W are admitted to practice before this Court, have knowledge and experience in bankruptcy practice, and are well qualified to represent Applicant.

5.

During the Chapter 11 case, Applicant will require professional services from attorneys, including:

- (a) Preparation of pleadings and applications;
- (b) Conduct of examinations;
- (c) Advising Applicant of her rights, duties and obligations as a trustee and fiduciary consistent with 11 U.S.C. §1106 and other relevant statutory provisions;
- (d) Consulting with Applicant and representing Applicant with respect to a Chapter 11 plan;
- (e) Performing those legal services incidental and necessary to the day-to-day operations of Debtor's business, including, but not limited to, institution and prosecution of necessary legal proceedings, and general legal advice and assistance; and
- (f) Taking any and all other action incident to the proper preservation and administration of the estate.

6.

Applicant desires to employ Jones & Walden, LLC at the firm's ordinary rates for comparable work, plus reasonable expenses, subject to review by the Court, during the pendency of this bankruptcy case. The firm has stated present fee rates of \$200.00 to \$375.00 per hour for attorneys and \$85.00 to \$125.00 per hour for legal assistants. Rates may be adjusted from time-to-time.

7.

Attached hereto and incorporated herein by reference is the Verified Statement of Leslie M. Pineyro, Esq. of Jones & Walden, LLC offered in support of this Application.

8.

Pursuant to Bankruptcy Rule 6003(a), Applicant shall not seek an order approving this application until 21 days after the filing of this motion.

WHEREFORE, Applicant prays that it be authorized to employ Jones & Walden, LLC as its attorneys in this Chapter 11 case.

Respectfully submitted this 7th day of January, 2020.

/s/ Leslie M. Pineyro
Leslie M. Pineyro, Chapter 11 Trustee
21 8th Street NE
Atlanta, GA 30309
404-564-9300 (phone)
404-564-9301 (fax)
lpineyro@joneswalden.com

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**DECLARATION IN SUPPORT OF TRUSTEE'S APPLICATION
FOR APPROVAL OF EMPLOYMENT OF ATTORNEY**

COMES NOW Leslie M. Pineyro, Esq., who states and declares:

1. I am a partner in the law firm of Jones & Walden, LLC (the "Firm") and in that capacity I have personal knowledge of, and authority to speak on behalf of, the Firm with respect to the matters set out herein. This Declaration is offered in support of the Application of the Trustee in the above-styled case to employ the Firm as the Trustee's attorney (the "Application"), and the matters set out herein are true and correct to the best of my knowledge, information and belief.

2. Neither I nor the Firm have or represent any interest adverse to the bankruptcy estate. The Firm has no connections with the Debtor, the Debtor's creditors, any other party in interest or their respective attorneys or accountants, provided that the Trustee, Leslie M. Pineyro, is employed as an attorney at the Firm. The Firm is not a creditor of the Debtor.

3. The Firm has no partners, associates or other professional employees who are related to the United States Trustee, any person employed in the office of the United States Trustee for the Northern District of Georgia, or with any of the Bankruptcy Judges sitting in the United States Bankruptcy Court for the Northern District of Georgia.

4. Neither I nor the Firm have agreed to share any compensation or reimbursement under 11 U.S.C. § 503(b) with any other person except within the Firm.

5. I and other attorneys of the firm are duly admitted to practice law in the United States District Court for the Northern District of Georgia, among other United States Courts. We

have had substantial experience in practice before the United States Bankruptcy Court for the Northern District of Georgia and before other Bankruptcy Courts.

6. To the best of the undersigned's knowledge, information and belief, employment of the Firm as attorneys for the Trustee would be appropriate under 11 U.S.C. § 327 and Bankruptcy Rules 2014 and 5002.

Declared on January 7, 2020.

JONES & WALDEN, LLC

/s/ Leslie M. Pineyro

By: Leslie M. Pineyro
Georgia Bar No. 003980
Proposed Counsel for Trustee
21 Eighth Street, NE
Atlanta, Georgia 30309
(404) 564-9300 Telephone
(404) 564-9301 Facsimile
lpineyro@joneswalden.com

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CERTIFICATE OF SERVICE

This is to certify that on this day the foregoing *Trustee's Application to Employ Jones & Walden, LLC as Counsel for Trustee* was electronically filed using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of and an accompanying link to the Application to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing Program:

- **Jonathan S. Adams** jonathan.s.adams@usdoj.gov
- **Office of the United States Trustee** ustpreion21.at.ecf@usdoj.gov
- **Howard P. Slomka** se@myatllaw.com,
myecfcalendar@gmail.com;myatllaw@gmail.com;info@myatllaw.com;notices@nextcha
pterbk.com;SlomkaTR74878@notify.bestcase.com;eisenlawfirm@gmail.com
- **J. Nevin Smith** awilson@smithconerly.com,
jsmith@smithconerly.com;R40523@notify.bestcase.com
- **David S. Weidenbaum** david.s.weidenbaum@usdoj.gov
- **R. Brian Wooldridge** bwool@mwklaw.org,
mwklaw@mwklaw.org;acrawford@mwklaw.org

This 7th day of January, 2020.

/s/ Leslie M. Pineyro
Leslie M. Pineyro, Chapter 11 Trustee
21 8th Street NE
Atlanta, GA 30309
404-564-9300 (phone)
404-564-9301 (fax)
lpineyro@joneswalden.com